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January 23, 2006

Ms. Shari Koslowsky
Wisconsin Department of Natural Resources
Office of Energy
101 S. Webster St. SS/7
Madison WI, 53707

RE: PROPOSED DANE COUNTY ELECTRIC RELIABILITY INITIATIVE: NORTH MADISON - HUISKAMP
CONSTRUCTION OF NEW 138 KILOVOLT TRANSMISSION LINE LOCATED IN DANE COUNTY, WISCONSIN.
PSCW Docket No. 137-CE-139

Dear Ms. Koslowsky:

American Transmission Company LLC has prepared and an application to be filed on or about January 23, 2006 with the Public Service Commission of Wisconsin (PSCW) for authorization to construct approximately 8.5 miles of new 138 kV overhead transmission line between the existing North Madison and Huiskamp substations in Dane County. The line would be constructed along existing transportation corridors, existing transmission line rights-of-way, and on new rights-of-way depending upon the final route chosen by the PSCW. The enclosed materials include descriptions of the proposed project and it's potential impact to rare species and natural communities identified in the Natural Heritage Inventory (NHI) database.

ATC contracted with Graef, Anhalt, Schloemer and Associates, Inc. (GASAI) to conduct a review of the species and communities listed in the NHI database, and the presence of habitat for these species in the project area. ATC used information provided in the report in conjunction with other environmental, land use, human use, and economic information to evaluate multiple potential routes during the process of determining two transmission line route alternatives.

Subject to receipt of PSCW authorization for this project, ATC anticipates construction of the transmission line to begin in Fall 2007 be complete in Spring 2008. ATC requests that you review and provide comment on the proposed project. These comments will be used by ATC to identify any modifications to construction methodology to reduce or eliminate effects, and by the PSCW in their review of the project.

If you have any questions on the proposed project or would like additional information, please contact me at (608) 877-3670.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Lee".

Amy Lee
Environmental Project Manager

enc.

RARE SPECIES INVESTIGATION REPORT

DANE COUNTY ELECTRIC RELIABILITY INITIATIVE
NORTH MADISON-HUISKAMP 138-KV TRANSMISSION PROJECT

CONFIDENTIAL



AMERICAN TRANSMISSION COMPANY
2 Fen Oak Court
Madison, Wisconsin 53718

December 7, 2005



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1 INTRODUCTION

This report prepared as part of the analysis of the North Madison-Huiskamp 138 kV Transmission Project. The report describes the approach to, and results of, rare species studies for the preferred route and an Alternate route to the west of it (Figure 1, Appendix A). Detailed information regarding this project can be found in the Application for Certificate of Public Convenience and Necessity, PSCW Docket No. 137-CE-139.

2 METHODS

2.1 BACKGROUND REVIEW

Background review for the rare species investigation included:

- A query of the Wisconsin Natural Heritage Inventory (NHI) database for known elements in the vicinity of the Preferred project (provided by ATC),
- A query of the Wisconsin State Herbarium and UW Stevens Point Herbarium websites,
- Review of “Element Species Abstracts” and other similar secondary sources, and
- A comparison of apparent habitat conditions along the study routes resulting from examination of secondary data to the habitat preferences of species identified in the NHI database query.

The matrix resulting from the background review was used to guide the field investigation carried out between September 14 and 21, 2005.

2.2 FIELD INVESTIGATION

The field review for rare species occurrence was carried out using a time-meander search along each of the study corridors. The field investigator walked along the corridor, verifying habitat conditions identified during the off-site analysis and increasing sampling rigor in areas having conditions suitable for rare species identified by the Wisconsin NHI that could reasonably occur within the project area.

3 RESULTS

3.1 GENERAL

The Wisconsin Natural Heritage Inventory (NHI) notes the presence of three historic and fifteen non-historic occurrences of threatened, endangered, or special concern species, and nine occurrences of natural communities within two miles of the Preferred and Alternate routes (Appendix B, Table 1).

3.2 THREATENED AND ENDANGERED SPECIES

Three of the non-historic element occurrences identified in the NHI database are classified as endangered (red-tailed prairie leafhopper, prairie bush clover, and rough rattlesnake-root), and five are classified as threatened (yellow giant hyssop, Henslow’s sparrow, Hill’s thistle, Blanding’s turtle, and prairie parsley). None of the non-historic NHI records for Threatened and Endangered species overlaps with either the Preferred or Alternate route corridors and none of the eight species were observed along either route during the field investigation. However, five of the species were deemed to have at least marginal habitat along one or both of the study corridors (Appendix B, Table 2).

3.3 SPECIAL CONCERN SPECIES

None of the seven non-historic NHI records for Special Concern species overlaps with either the Preferred or Alternate route corridors and none of the species were observed along either the Preferred or Alternate route during the field investigation. However, three of the species were deemed to have at least marginal habitat along one or both of the study corridors (Appendix B, Table 2).

3.4 NATURAL COMMUNITIES

None of the natural communities listed in the NHI database are located within 250 feet of either the Preferred or Alternate route centerlines and no additional natural communities were identified during the field investigation. Because the natural communities listed in the NHI database do not extend up to either the Preferred or Alternate route corridors, the transmission line project poses no risk of degrading them.

4 SUMMARY

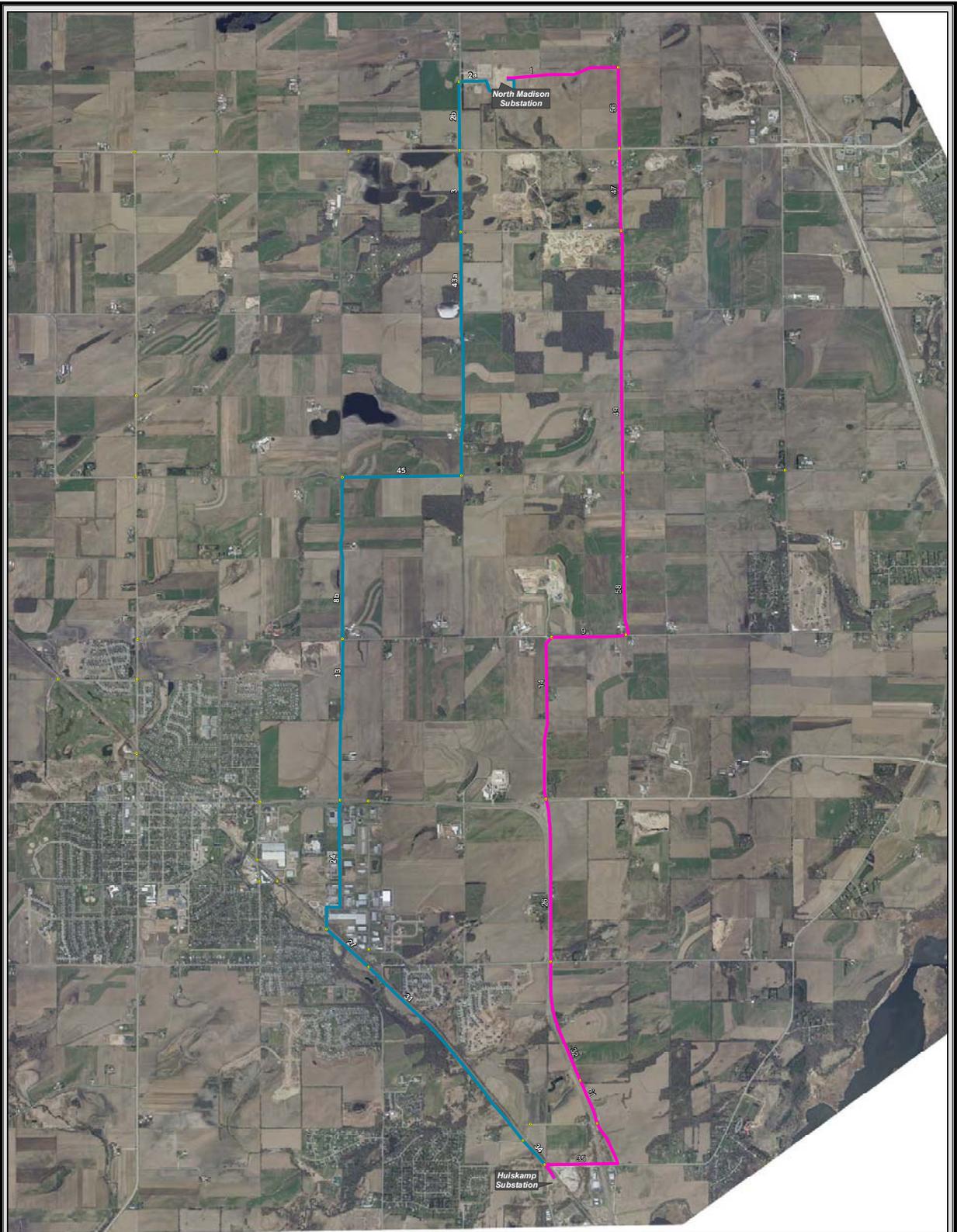
The NHI notes the presence of three historic and twenty non-historic occurrences of threatened, endangered, or special concern species, and nine occurrences of natural communities within two miles of the preferred and Alternate routes. None of these element occurrences was identified along either of the two routes. Since the corridors tend to run through agricultural land and follow road edges, which are subject to frequent disturbance, observed habitat quality was generally poor. Most of the higher quality habitat is associated with the Six-Mile Creek corridor along the Alternate Route. Therefore, if this route is selected, it may be prudent to complete another investigation of this area in late spring or early summer.

The risk of direct impact to any of the species identified within two miles of the Preferred project or substantial indirect impact to their suitable habitat from construction of the Preferred transmission line appears minimal. The risk is minimal because most of the route corridors have already been developed, avoidance measures will be implemented if a species is subsequently identified, ATC's standard construction techniques should result in minimal ground disturbance, and the change to existing habitat conditions from the resulting towers and wires would be negligible.

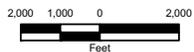
APPENDIX A

Figures

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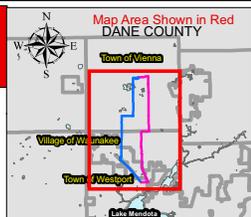


Map Data Sources: ATC

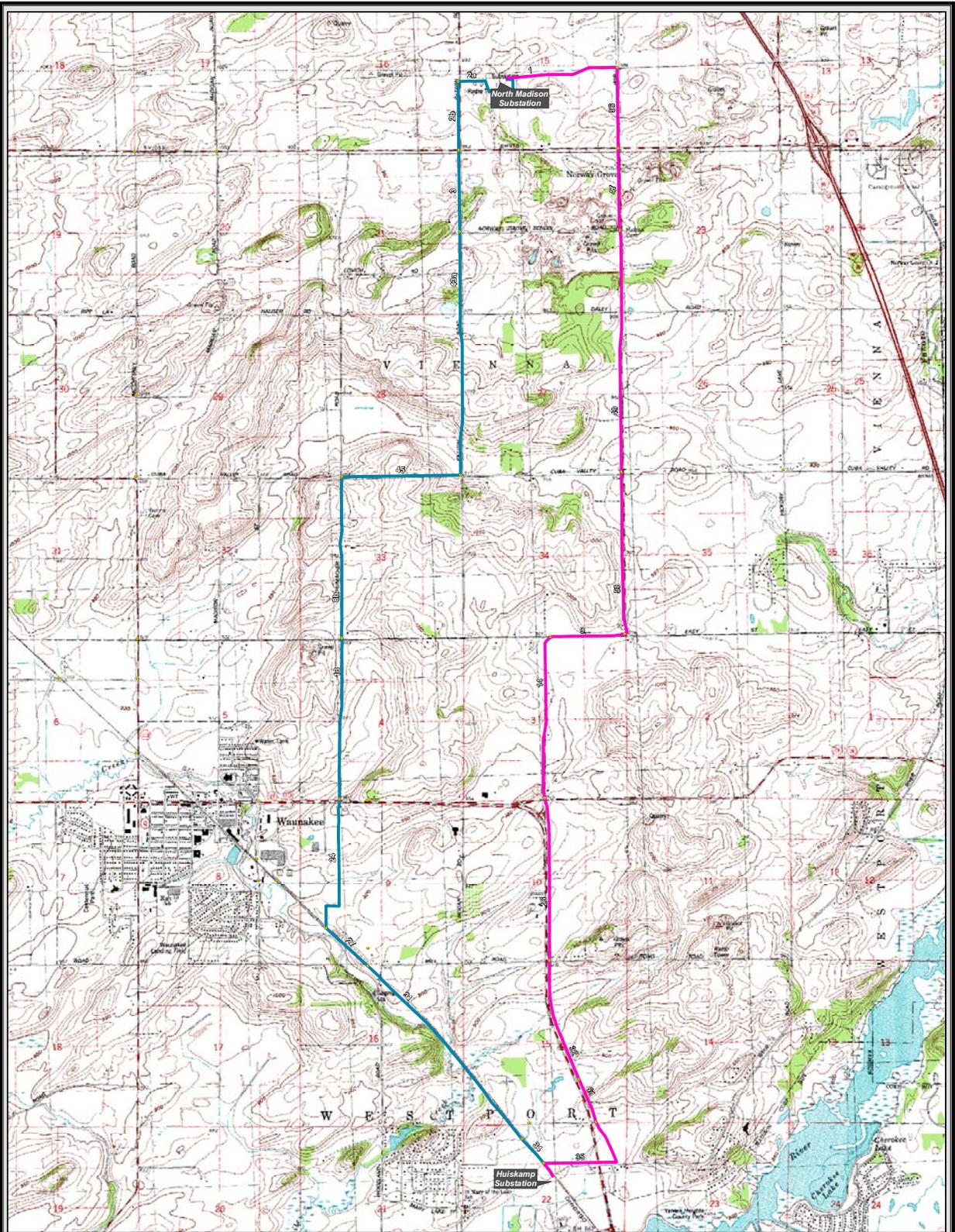


NORTH MADISON - HUISKAMP NEW 138 kV LINE
GENERAL ROUTE AND SEGMENT LOCATIONS
Preferred and Alternate Routes

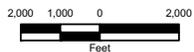
-  Preferred Route
-  Alternate Route
-  Existing Transmission Lines
-  Segment Labels
-  Segment Nodes



APPENDIX A - FIGURE 1a
 GENERAL ROUTES
 AND SEGMENT LOCATIONS

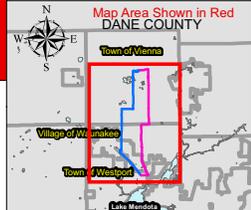


Map Data Sources: ATC, USGS



NORTH MADISON - HUISKAMP NEW 138 kV LINE
GENERAL ROUTE AND SEGMENT LOCATIONS
Preferred and Alternate Routes

- Preferred Route
- Alternate Route
- Existing Transmission Lines
- Segment Labels
- Segment Nodes



APPENDIX A - FIGURE 1b
 GENERAL ROUTES
 AND SEGMENT LOCATIONS

APPENDIX B

Tables

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Table B-1. Natural Heritage Inventory Data for Species and Natural Communities Identified as being within Two Miles of the Centerlines of the Proposed and Alternate Routes for the North Madison to Huiskamp 138-KV project

Element Type	Element Occurrence ID	Scientific Name	Common Name	Survey Site	Last Year Observed	Group Name	State Status
Threatened and Endangered Species							
Historic							
Non-historic					1900	Fish~	THR
					2003	Leafhopper	END
					1995	Plant	THR
					1995	Plant	THR
					1999	Plant	THR
					1985	Bird	THR
					2001	Bird	THR
					1988	Plant	THR
					2002	Plant	THR
					1981	Turtle~	THR
					2002	Plant	END
					1991	Plant	THR
					2001	Plant	END
Special Concern Species							
Historic					1937	Mammal	SC/N
					1964	Fish~	SC/N
Non-historic					1979	Fish~	SC/H
					1979	Fish~	SC/N
					1980	Fish~	SC/N
					1975	Fish~	SC/N
					1975	Fish~	SC/N
					2001	Bird	SC/M
					1991	Plant~	SC
					2003	Plant	SC
Communities							
Non-historic					1976	Community~	
					1985	Community	
					1985	Community	
					2001	Community~	
					1977	Community	
					1982	Community	
					1985	Community	
					1973	Community	
					1998	Community~	

Table B-2. List of non-historic species identified by the Wisconsin Natural Heritage Inventory within two miles of the proposed North Madison to Huiskamp 138-kV project, their general habitat preferences, and habitat presence within the study corridors.

Scientific name	Common name	Status	General Habitat Preference	Habitat Present Along Study Corridors?	Impact Potential
		E	inhabits dry to wet-mesic prairies and low fire frequency (WDNR 1999).	No	None
		T	Yellow Giant Hyssop occurs in moist, open woodland areas on rich soils and calcareous bedrock, thickets, woodland borders, and disturbed areas such as along railroad tracks, fencerows, floodplains, and disturbed woodlands (Toomey and Toomey 2002).	Yes Pref. Rte. Segment 36; Alt. Rte. Segments 27, 31, 34, 36, 43a.	Minimal – most of the route corridors have already been developed, avoidance measures will be implemented if species is subsequently identified. ATC's standard construction techniques should result in minimal ground disturbance.
		T	Plains regions, in tallgrass prairie with some forbs and shrubs. Today, they are restricted to neglected grassy fields, pastures and meadows with a scattered shrub presence, and hayfields with dense cover. They are rarely encountered in grasslands <250 acres in size (Currier 2001).	Yes – Marginal Pref. Rte. Segment 35; Alt. Rte. Segments 3, 31.	Minimal – most of the route corridors have already been developed, the species can avoid construction activities, ATC's standard construction techniques should result in minimal ground disturbance, and the change to existing habitat conditions from the resulting towers and wires would be negligible.
		T	is known from dry, sandy, gravelly soils in prairies, jack pine barrens, oak savanna, and open woods. In Michigan and Wisconsin, it is also known from limestone pavement communities (Higman and Penskar 1996).	Yes – Marginal Pref. Rte. Segments 32, 35, 36, 61; Alt. Rte. Segments 31, 34, 36, 43a.	Minimal – most of the route corridors have already been developed, avoidance measures will be implemented if the species is subsequently identified. ATC's standard construction techniques should result in minimal ground disturbance.
		T	is a primarily aquatic species that may be found in Marshes, ponds, swamps, lake shallows, backwater sloughs, shallow slow-moving rivers, protected coves and inlets of large lakes, oxbows, and pools adjacent to rivers; waters with soft bottom and aquatic vegetation (NatureServe 2005).	Yes – Marginal Pref. Rte. Segments 27, 31	Minimal – Aquatic habitat generally not disturbed, avoidance measures will be implemented if species is subsequently identified.
		E	has been associated with both disturbed and undisturbed sites, sandy barrens, and openings. Habitat types in which currently occurs include dry-gravel and dry-mesic prairies in Illinois, dry prairie and sandy prairie in Wisconsin, and dry-mesic prairie in Iowa and Minnesota (Zambra Engineering 1998).	No	None
		T	habitat includes dry to dry-mesic prairies and savannas, and rocky open glades often over limestone (Olson 2002).	No	None
		E	Dry, open to semi-open situations, usually in acid, sandy or rocky soil; open rocky woods, prairie remnants, barrens, and along roadsides and railroads (Burns 1983).	Yes Pref. Rte. Segments 32, 35, 36, 61; Alt. Rte. Segments 31, 34, 36, 43a.	Minimal – most of the route corridors have already been developed, avoidance measures will be implemented if the species is subsequently identified. ATC's standard construction techniques should result in minimal ground disturbance.
		SC	shallow areas of large lakes where small benthic organisms that serve as food are abundant. They are most often associated with deep run and pool habitats of rivers (i.e., >5 ft deep) and generally avoid aquatic vegetation (GoForth 2000).	No	None
		SC	Females inhabit large streams and lakes, and in brackish or saltwater in some areas, seeking muddy bottoms and still waters. Males are found mainly in brackish estuaries. Larvae move from open sea to coastal waters, metamorphose, then mostly females enter freshwater (NatureServe 2005).	No	None
		SC	Open waters of lakes and large rivers; coastal waters of Hudson Bay. Moves into deeper water, to just below thermocline, in summer. Sometimes in large rivers. Often spawns in shallow water (1-3 m) over gravel or stony substrate, but also may spawn pelagically in midwater (NatureServe 2005).	No	None
		SC	Quiet waters of lakes, ponds, and sluggish streams usually over sand, gravel, or detritus-covered bottom where there are patches of submerged aquatic plants (NatureServe 2005).	Yes – Marginal Pref. Rte. Segments 27, 31	Minimal – Aquatic habitat generally not disturbed, avoidance measures will be implemented if species is subsequently identified.

